

1. Admitted.
2. Admitted, with the exception that defendant denies that an event occurred.
3. Admitted.
4. This defendant has insufficient information to neither admit nor deny the allegation contained in paragraph 4 of the complaint.
5. Admitted.

6. Admitted.

COUNT I-VIOLATION OF THE AMERICANS WITH DISABILITIES ACT

7. Admitted.

8. Admitted.

9. Admitted.

10. Admitted.

11. Denied.

12. Denied.

13. Denied.

14. Defendant denies that it deprived the plaintiff of equal access, yet is unable to admit or deny the balance of the allegation in this paragraph.

15. Admitted.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

COUNT II-VIOLATION OF THE NEW JERSEY LAW AGAINST DISCRIMINATION

22. The defendant repeats and reasserts its responses to paragraph 1 through 21 as is set forth at length herein.

23. Admitted.

24. Admitted.

25. Admitted.

26. Admitted.

27. Admitted.

28. Admitted.

29. Denied.

30. Denied.

31. Denied.

32. Denied.

FIRST AFFIRMATIVE DEFENSE

The plaintiff does not have standing to bring this action.

SECOND AFFIRMATIVE DEFENSE

The relief sought by the plaintiff is not readily achievable.

THIRD AFFIRMATIVE DEFENSE

Plaintiff fails to state a cause of action for which relief could be granted.

FOURTH AFFIRMATIVE DEFENSE

The relief sought by plaintiff could result in a fundamental alteration in the nature of the premises and services provided by the facility.

FIFTH AFFIRMATIVE DEFENSE

The relief sought by the plaintiff is technically infeasible.

SIXTH AFFIRMATIVE DEFENSE

The relief sought by the plaintiff would entail an undue burden to the defendant.

SEVENTH AFFIRMATIVE DEFENSE

The lawsuit has been filed in bad faith, and for improper motives and constitutes a frivolous lawsuit pursuant to Rule 11 of the Federal Rules of Civil Procedure.

DEMAND FOR JURY TRIAL

The Defendant hereby demands a trial by jury on all issues so triable as a matter of right.

Dated: October 6, 2015

FAUGNO & ASSOCIATES, L.L.C.
Attorneys for Defendants

s/ Paul Faugno

Paul Faugno, Esq.